

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

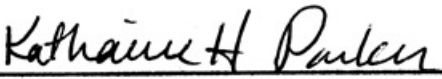
JEFFREY F. FRANK
Assistant Corporation Counsel
Email: jefrank@law.nyc.gov
Cell: (929) 930-0780
Tel: (212) 356-3541

November 7, 2022

VIA ECF

Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

11/09/2022

Re: *Xiamin Zeng v. City of New York, et al.*,
19 Civ. 3218 (JGK) (KHP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and attorney for defendants City of New York, Detective Danielle Febus, and Police Officer Erlene Wiltshire in the above-referenced matter. I write to inform the Court that discovery is complete.

Pursuant to the Court's October 7, 2022 Order (Docket Entry ("DE") No. 99), defendants intended to submit this letter jointly with plaintiff. Early this afternoon, defendants e-mailed a proposed draft of this letter to plaintiff's counsel. As of this writing, however, defendants have not received a response. As such, defendants submit this letter without plaintiff's input.

Defendants write to inform the Court that a settlement conference is not likely to be productive at this time. Should the parties agree, at a later time, that a settlement conference may be productive, the parties will promptly notify the Court and request a settlement conference.

Further, defendants intend to file a letter requesting a pre-motion conference in advance of their motion for summary judgment. Their deadline for doing so was most recently extended to November 11, 2022. (DE No. 96). Thereafter, the Court further extended the close of discovery until November 7, 2022, but the deadline for initiating dispositive motion practice was not reset. Defendants respectfully request that the Court reset that deadline for December 16, 2022.

Defendants thank the Court for its consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeffrey Frank", written over a horizontal line.

Jeffrey F. Frank
Assistant Corporation Counsel
Special Federal Litigation Division

cc: All Counsel (via ECF)